

U.S. EPA Proposes Changes to the Record of Decision for the American Chemical Service Site

Griffith, Indiana

April 1999

INTRODUCTION

The U.S. Environmental Protection Agency (U.S. EPA) is issuing this Proposed Plan to present U.S. EPA's proposed amendments to the 1992 Record of Decision (ROD) for the American Chemical Service (ACS) Superfund Site, Griffith, Indiana. U.S. EPA is presenting the proposed changes to the 1992 ROD to the public for comment as a part of the Agency's responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended. CERCLA is more commonly known as "Superfund."

U.S. EPA is proposing to amend the 1992 ROD to perform a combination of certain cleanup remedy elements that were previously evaluated in the 1992 ROD document, but portions of which were not selected as the 1992 cleanup remedy. This ROD Amendment proposal consists of: (1) a revision to the assumed future use of the ACS property from residential use to industrial use; (2) a modification of the site cleanup approach from full treatment of contaminated materials to a combination of containment (using subsurface barrier wall and capping technologies) and partial treatment of mobile contaminants: (3) a modification to the wetlands cleanup method; (4) a modification to the groundwater contaminant plume cleanup method; and (5) the placement of deed restrictions on the future uses of the site. The ROD Amendment proposal and the rationale behind it are described below.

Public input on this Proposed Plan and the information on which U.S. EPA relied to propose the changes described herein is an important component of the Superfund cleanup process. Based upon new information and/or public comment, U.S. EPA may either modify this Proposed Plan or present another cleanup alternative in a subsequent Proposed Plan. All of the information U.S. EPA relied upon to produce this Proposed Plan is available for review in the Administrative Record for the site. The address for the information repository where you can review the Administrative Record is on page 11 of this fact sheet. You are encouraged to review all of the information and provide U.S. EPA with your comments on this Proposed Plan for ROD Amendment for the ACS Site.

This fact sheet provides information on. . .

- Site background and history
- A summary of U.S. EPA's proposed changes to the ROD and the reasons for the proposed changes
- Public involvement activities

PUBLIC COMMENT PERIOD

U.S. EPA will accept oral and written comments on its proposed changes to the ROD during a 30-day public comment period

April 19 through May 21, 1999

Written comments can be sent to Noemi Emeric, Community Involvement Coordinator, at the address listed in this fact sheet.

PUBLIC MEETING

U.S. EPA is holding a meeting to explain its proposed changes to the 1992 ROD and to accept public comments on its proposal

Thursday, May 13, 1999 Date:

7:00 to 9.00 p.m. Time: Griffith Town Hall Place:

111 N. Broad Street Griffith, Indiana

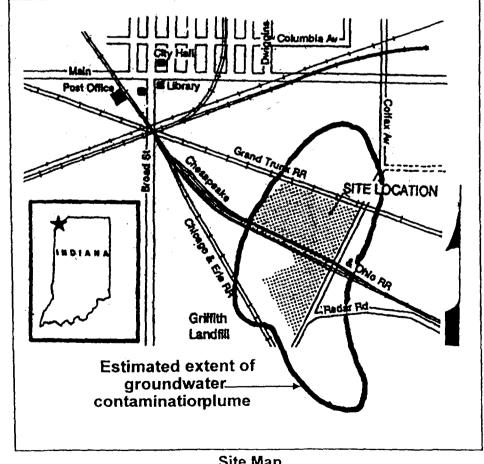
BACKGROUND

The ACS Site is located at 420 S. Colfax Ave., Griffith, Indiana, (see figure) and is comprised of 19 acres of American Chemical Service Corporation-owned or leased property that includes the so-called "Off-Site Containment" and the "On-Site Containment" areas, the 2-acre property known as the "Kapica-Pazmey" property, and a 15-acre portion of the Griffith Municipal Landfill. Groundwater contaminant plumes emanate from the ACS Site (as demonstrated in the figure) and certain nearby wetland areas have been impacted by site wastes.

The American Chemical Service Corporation (ACSC) began a solvent recovery business on the ACS property in May 1955. ACSC past waste handling, storage, and disposal practices have led to the contamination of the site (except for the Town of Griffith Landfill area and the Kapica-Pazmev area) to the extent described in the 1992 ROD and other documents. Upon losing its interim (authorization to operate) status under the

Resource Conservation and Recovery Act (RCRA) in 1990, ACSC ceased its solvent reclaiming activities, although it continues its specialty chemical manufacturing operations to this day.

The ACS Site has been extensively studied and tested to determine the nature and extent of chemical contamination in and around the site. The Remedial Investigation (RI) report shows that there are large areas on site with numerous types of buried contaminants that are both sources of groundwater contamination and potential contact hazards for site workers. Major waste categories include volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs). polychlorinated biphenyls (PCBs), and heavy metals. These contaminants are found at variable concentrations within the Off-site Containment area the Kapica/Pazmey area, and in the On-site Containment area. VOCs such as benzene and chloroethane are a concern in area groundwater.



Site Map

The 1992 ROD detailed U.S. EPA's determination that the purpose of the selected remedy was to restore the contaminated property using cleanup levels that would allow the future unrestricted use of the property, i.e., for residential use. Groundwater-use restrictions were contemplated for areas beyond ACSC property boundaries until the groundwater quality was restored to drinkable status. The future use of groundwater directly under the site would also be restricted. The methods to be used to perform the cleanup at the ACS site were:

- The excavation of buried wastes and up to 135,000 cubic yards of contaminated soils and debris, with subsequent on-site treatment of organic contaminants using low-temperature thermal desorption (LTTD) on soils and other methods such as steam-cleaning on the debris; metals-containing residuals may have needed a further immobilization step;
- 2. The off-site disposal of miscellaneous debris;
- 3. The excavation of approximately 400 drums in the On-site Containment area with shipment off site for incineration of the contents;
- 4. The implementation of soil vapor extraction (SVE) of VOC-contaminated soils, including the performance of a SVE pilot study in the buried waste in the On-site Containment area;
- The construction of a groundwater extraction and treatment system capable of dewatering the site and also containing the off-site groundwater contaminant plume; treated water would be discharged to the wetlands;
- 6. The further evaluation and monitoring of the impacted wetlands with possible cleanup of the wetlands;
- 7. The placement of a security fence around the site to prevent access to contaminants and the implementation of deed restrictions on the property; and
- 8. The implementation of long term groundwater monitoring, including private well sampling; impacted wells would be subjected to closure or the owner would receive groundwater-use advisories.

(Note: the 15-acre portion of the Griffith Municipal Landfill is being addressed separately by the Town of Griffith through the Indiana State Solid Waste closure/post-closure program.)

The 1992 ROD also called for the LTTD and SVE systems to undergo treatability testing to determine if hese cleanup methods would be able to attain final cleanup levels.

Based on a combined estimated volume of 135,000 cubic yards of impacted soil and debris, the 1992 ROD estimated that the selected cleanup remedy would cost between \$38 million and \$47 million to construct and implement over a 6-year to 8-year time frame.

SITE HISTORY POST-1992 ROD

In selecting the remedial action for the ACS site, U.S. EPA had relied upon, among other factors, waste-treatment volume estimates drawn from the RI report. After releasing the 1992 ROD, and in preparation for implementation of the cleanup, U.S. EPA conducted both additional sampling at the

site and site-waste materials handling and treatability studies in the laboratory in 1997 to ascertain the accuracy of the soil volume estimate and to determine if LTTD was a viable cleanup remedy for the ACS site. The results of these testing efforts are contained in the reports entitled

"Pretreatment/Materials Handling Study Report" (1997) and "Thermal Treatability Study" (1998).

Results of the Materials Handling Study indicate that an estimated volume of 150,000 to 200,000 cubic yards of contaminated waste, soils, and debris would have to be excavated and treated using LTTD alone to remove VOCs in order to meet the residential cleanup levels contained in the 1992 ROD. Municipal waste and other debris was found not to be treatable using the 1992 ROD steam cleaning method. Thus, the estimated volume of soils to be treated using the resource-intensive LTTD method had greatly increased. Moreover, much of the material could not be treated effectively using LTTD, since some of the waste stream was municipal waste which is not considered to be amenable to LTTD, and new disposal methods will have to be found. The waste handling study results project the need for an extra high level of safety requirements for site workers due to the high levels of VOCs that would be encountered when contaminated soils, wastes, and debris were excavated for treatment. The high levels of VOCs could constitute an explosion hazard as well as an exposure hazard to the workers and plausibly to area residents.

Lastly, it was concluded that since LTTD would not be a practicable treatment alternative and that onsite incineration, which is more expensive and perhaps not allowable under Indiana State law, would be required to properly treat the excavated wastes, other management options may be necessary for ACS site wastes. Based upon the findings of the materials handling studies, the recalculated cleanup cost estimate for the 1992 ROD remedy is now \$150 million to \$246 million, a substantial increase from the original \$38-47 million cost estimate.

U.S. EPA also performed sampling of wetland soils/sediments during 1996 to delineate the extent of PCB-impacted soil/sediment. Some areas contain PCBs in soil/sediment above 1 ppm, with values exceeding 50 ppm in some cases.

U.S. EPA, in consultation with IDEM and wetlands experts, has determined that wetland soil/sediments containing greater than 1 ppm PCBs should be excavated and managed on-site or disposed of properly off-site.

During 1996-1997, U.S. EPA performed further sampling work to more fully delineate the off-site groundwater contaminant plumes. As shown in the

figure on page 2, groundwater contaminant plumes. defined as those areas at which the groundwater exceeds contaminant cleanup levels, are present to the north and south of the site. Aguifer characteristics are such that it may be impracticable to implement a plume-wide groundwater pump-andtreat program to restore groundwater quality. U.S. EPA is evaluating the use of a combination of active restoration methods, such as groundwater pump-and-treat and in-situ oxidation strategies, and monitored natural attenuation to effect cleanup of the groundwater. Monitored natural attenuation consists of the monitoring of natural processes in the aquifer which act to biodegrade, dilute, or adsorb groundwater contaminants so as to make them immobile, dilute, or break down into less harmful compounds to prevent exposure to harmful levels of contaminants.

Lastly, as the above additional studies were being performed, certain cleanup work was also being performed at the ACS site. A subsurface barrier wall was installed around the ACSC property in 1997 in an effort to contain the wastes on site. Further, a groundwater extraction system was installed inside the barrier wall to dewater the area to prevent movement of groundwater over and outside of the wall. Lastly, a groundwater extraction system was installed to the north of the site to control the movement of the more highly impacted groundwater in this area. Water pumped from both systems is being routed to an on-site treatment plant to remove the chemical contaminants before the cleaned water is discharged into the wetland areas.

PROPOSED PLAN FOR ROD AMENDMENT

Based upon the new information created by the Materials Handling Study work described above and a request from the ACS potentially responsible party (PRP) group that U.S. EPA reconsider the future site-use assumption in making a cleanup decision, U.S. EPA is proposing to amend the 1992 ROD. The new cost estimate information shows that the 1992 ROD cleanup method would not be cost effective in comparison to other cleanup or waste management methods. Moreover, the future use of the site property is now assumed to be industrial, in concert with the current zoning designation assigned by the Town of Griffith. U.S. EPA would have concerns regarding the health and safety of site cleanup workers, ACSC

workers, and the surrounding public should widespread waste excavation occur since the high levels of VOCs could create a health hazard. Lastly, the treatability studies show that the selected treatment method, LTTD, would not be effective in treating a majority of site wastes.

Using a combination of cleanup alternatives evaluated in the 1992 ROD, including containment-type alternatives and treatment alternatives, U.S. EPA is proposing that containment of wastes be effected by utilizing applicable portions of Alternative 2 in the 1992 ROD - subsurface barrier wall and surface capping, and Alternative 5 - soil vapor extraction of VOC-laden soil and debris with the excavation and incineration of the contents of buried drums in the On-site Containment area.

Some groundwater would be extracted and treated pursuant to plans and specifications developed in accordance with Alternatives 2 and 5 of the 1992 ROD. However, U.S. EPA believes that testing of an place cleanup alternatives and of monitored natural attenuation should also be pursued.

Other portions of the alternate remedy include the excavation of PCB-laden wetland soil/sediment with the consolidation of total PCB levels less than 50 ppm on site under the cap and the off site disposal of material containing greater than 50 ppm. Deed restrictions would be placed on the property to ensure that should a zoning change to residential use be made, such a change is accompanied by the proper cleanup effort needed for the new siteuse assumption. (Note: deed restrictions are now in place and can only be removed from the property with U.S. EPA concurrence.)

→DETAILED DESCRIPTION OF PROPOSED ROD AMENDMENT

The ROD Amendment proposal provides for the protection of human health and the environment through a combination of the following:

1. Limitations on the potential for future exposure to contaminants

U.S. EPA proposes that two methods be used to isolate contaminated areas to prevent future exposure to site contaminants:

a. Barrier Technologies

As described by Alternative 2 of the 1992 ROD. U.S. EPA would construct a subsurface barrier wall (sometimes termed a "slurry wall"), around the entire site to minimize the movement of site contaminants off-site and to impede groundwater flow into the site. The barrier wall would be keyed into a clay confining layer approximately 25 feet below the surface. An inward groundwater gradient would be maintained across the wall by pumping groundwater from within the area surrounded by the slurry wall. Contaminant source areas would also be covered with a soil cap to minimize infiltration of rainwater and snowmelt into the area enclosed by the slurry wall and to also prevent the direct contact with site contaminants by workers. (Note: a barrier wall consisting of high-density polyethylene plastic and a bentonite-soil slurry was installed around the ACS site in 1997.)

b. Deed Restriction

A deed restriction will be maintained on the ACS property so that the future use of the property will be restricted to those activities which do not interfere with the performance of any cleanup activities listed in the 1992 ROD and this Proposed Plan (if approved) or disturb the integrity of the soil cap to be placed over the site.

2. Treatment of subsurface soils through soil vapor extraction

As described in Alternative 5 of the 1992 ROD, U.S. EPA would dewater the area behind the barrier wall, using a series of groundwater pumping wells. to allow for the excavation of intact drums containing hazardous wastes. Intact buried drums in the On-site Containment Area would be incinerated off-site. An in-situ vapor extraction (SVE) system would then be installed in certain areas of the site to treat both soils and buried wastes to remove VOCs and to also help to biodegrade VOCs and SVOCs in the ground. Removal of VOCs helps to prevent failure of the slurry wall and removes the explosion hazard associated with excavation of the soils. Collected VOCs and SVOCs would be destroyed on-site using catalytic oxidation equipment or captured on activated carbon for off-site destruction or disposal. (Continued on page 8)

EVALUATION OF PROPOSED ROD AMENDMENT

U.S. EPA has evaluated the 1999 ROD Amendment proposal in comparison to the 1992 ROD remedy using the nine criteria below:

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Overall Protection of Human Health and the Environment				
Addresses whether or not a remedy provides adequate protection and describes how risks posed through each pathway are eliminated, reduced, or controlled through treatment, engineering controls, or institutional controls	Will protect human health and the environment Relies solely on the destruction and/or solidification of soil contaminants Addressed soil exposure pathway through the excavation of contaminated soil until cleanup levels were achieved with the subsequent treatment of contaminated soil using LTTD and the solidification of soil contaminated with heavy metals Stipulate that groundwater on site and off site was to be extracted, treated, and discharged to the wetlands		i i	Will protect human health and the environment Relies on a combination of treatment and containment methods to minimize exposure pathways Addresses soil exposure pathway through placement of a soil cap and barrier wall plus implementation of SVE to remove VOCs and, to a lesser extent. SVOCs from the ground PCB-ladden soil excavation in the wetland area and the placement of deed restrictions on the property would also prevent exposures to c. ntaminants. Also addresses groundwater contamination through a combination of plausible active and passive restoration method.
. Compliance with Application or Relevant and Appropriate Requirements	(ARARs)			
Addresses whether or not a remedy will meet all of the ARARs of federal and state environmental laws	Would have complied with a	ARARs listed in that document	. 1	Will comply with ARARs listed in the document
Long-Term Effectiveness and Permanence				
Refers to the ability of a remedy to maintain reliable protection of human health and the environment over time, once cleanup goals have been met	 Achieved long-term effectiveness and permanence through removal and destructive treatment of groundwater, subsurface soil, and surface soil contaminants (except heavy metals, which cannot be destroyed) 			Achieves a lower level of long-term effectiveness and permanence for the soil, although some treatment of VOCs would occur. Residuals would be managed by containment within the barrier wall and cap structures over the long term.
4. Reduction of Toxicity, Mobility, or Volume				
Refers to the anticipated performance of the treatment technologies a remedy may employ	Utilized permanent treatment technologies to address site contaminants Would treat the entire contaminant mass		• ;	Would only treat the VOCs and SVOCs to a lesser extent However, SVE treatment would remove the more mobile compounds so that they are not a future source of groundwater contamination
5. Short-Term Effectiveness				
Involves the period of time needed to achieve protection and any adverse impacts on human health and environment that may be posed during the construction and implementation of the cleanup action	Short-term impacts typically associated with targe-scale excavation activities (such as the release of dust and of vapors from wastes with high levels of VOCs) and the methods to alleviate the impacts (expensive vapor-control methods) would be of concern under the 1992 ROD. Would have required about 6-8 years to complete the excavation and LTTD process. Groundwater cleanup effort is estimated to be the same under the 1992 ROD or the proposed ROD Amendment.		d be	Short-term impacts due to site cleanup work are estimated to be lower. Yolume of contaminents that would be excavated is significantly less. Duration of these impacts are expected to be much shorter. In addition, due to other factors besides the soil volume difference, the length of time of the cleanup activities to be performed under the ROD Amendment proposal is self-mated to be flruch shorter than under the 1992 ROD, it is estimated that the ROD Amendment proposal would take about 3 years to complete construction work, from the tile equipment is brought to the site to begin work to the time the last of the soil cap is in place, although the SVE equipment will likely operate for 2 to 10 years before it can be turned off.
6. Implementability		· · · · · · · · · · · · · · · · · · ·		
fs the technical and administrative feasibility of a remedy, including the availability of goods and services needed to implement the chosen solution	More difficult to implement Construction and operation of the LTTD technology more difficult logistically			Less difficult to implement Construction and operation of SVE equipment less difficult logistically; SVE technology readily available on a commercial scale and has been previously used for the treatment of VOCs at other sites
7. Cost				
Includes estimated capital and operation and maintenance costs and estimated present worth costs	 Revised cost estimate is \$ 	150 to \$246 million		Estimated cost using one or more of the various cleanup methods ranges from \$47 to \$50 million (as revised due results of the materials handling and treatability studies)
8. Support Agency Acceptance				
Indicates whether, based on its review of the Proposed Plan, the support agency concurs, opposes, or has no comment on the preferred alternative; this appellance will be assessed from support agency comments received during the public comment period	Approved by Indiana Depa	artment of Environmental Management (IDEM)		IDEM expected to evaluate its position during the public comment period and will convey that finding to U.S. EPA conclusion of the comment period
9. Community Acceptance				

3. Extraction and treatment of contaminated groundwater

Groundwater pumping and treatment would be performed in certain areas outside the barrier wall to restore groundwater quality. Treated groundwater would be discharged to the wetlands. Monitored natural attenuation and in-ground treatment methods may also be tested and used if successfully proven to restore groundwater quality. Natural attenuation is the general process of monitoring water quality over a period of time to demonstrate that natural processes are causing contaminant levels to fall due to a combination of dilution, biodegradation, and sorption forces within the groundwater aquifer. Should dilution, biodegradation, and sorption forces cause water

quality to improve in a reasonable time frame versus active treatment methods, then monitored natural attenuation can be considered to be a viable cleanup alternative for groundwater. In-ground treatment methods could include the introduction of oxygen-releasing compounds into the contaminant areas to aid in the biodegradation of organic compounds in order to improve water quality.

4. Excavation of impacted wetlands soils

As above, the excavation of PCB-laden wetland soil/sediment with the consolidation of levels less than 50 ppm on site under the cap and the off site disposal of material containing greater than 50 ppm would be performed to remove direct contact hazards.

STATUTORY DETERMINATIONS

Superfund law requires U.S. EPA to clean up NPL sites to achieve the protection of human health and the environment in compliance with Federal and state environmental laws and policies (ARARs). Selected cleanup remedies must also be cost-effective and utilize permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable, with an emphasis on cleanup remedies that employ treatment to permanently and significantly reduce the toxicity, mobility or volume of the hazardous substances, pollutants or contaminants. Based upon the evaluation of the nine criteria, U.S. EPA believes that the ROD Amendment proposal presented herein satisfies the requirements set forth in Superfund in that the ROD Amendment proposal would be protective of human health and the environment, would attain ARARs, would be cost-effective, and would use treatment technologies to permanently and significantly reduce the toxicity, mobility or volume of the hazardous substances, pollutants or contaminants to the maximum extent practicable.

GLOSSARY

Low Temperature Thermal Desorption is a process through which contaminated soils are heated to high temperatures, but to lower temperatures than in an incinerator. The contaminants are removed as a vapor. The contaminated soils are first broken up, then they are fed into an oven which is heated to a temperature which will volatilize organic compounds but not burn them. An inert "carrier" gas, such as nitrogen, is swept through the hot oven, displacing oxygen and preventing burning. Instead, the vaporized contaminants are condensed from the carrier gas and collected for proper off-site disposal. The cleaned soils are then replaced back into the ground. Also called Low Temperature Thermal Treatment.

Soil Vapor Extraction is a process through which soils contaminated with volatile organic compounds (VOCs) are cleaned up without excavating the wastes for treatment. Shallow wells are drilled into the affected areas and a vacuum is placed on the wells. The vacuum draws soil gases including the VOCs out of the soil and into a treatment device. Many times some of the wells are configured to allow air to be vented into the ground at the same time, which helps to introduce oxygen into the subsurface to induce biological breakdown of many organic chemicals and to also help sweep the VOCs towards the vacuum wells. Since the cleanup work is performed in place, the work is much safer and can be less expensive than most soil excavation and treatment remedies.

Public Comment Sheet

Your input on the proposed amendments to the 1992 ROD for the American Chemical Service Site is important to the U.S. EPA. Comments provided by the public are valuable in helping the U.S. EPA select a final remedy for the site.

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American Chemical Service Site Public Comment Sheet

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Address								
City	State							



Noemi Emeric

Community Involvement Coordinator
Office of Public Affairs (PS-19J)
U.S. EPA - Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

ADDITIONAL INFORMATION

U.S. EPA notes that the following documents are available for review at the information repositories maintained at the Griffith Town Hall and the Griffith Branch Library:

- ◆ Perimeter Groundwater Containment System Plans and Specifications (1996)
- Barrier Wall and Associated Groundwater Extraction System and Pilot Study Test Cells (1996)
- Pretreatment/Materials Handling Study Report (1997)
- ◆ Thermal Treatability Study (1998)
- ◆ Alternative Remedy Nine Criteria Evaluation (1998)
- ◆ 30 Percent Remedial Design Report Conceptual Alternative Remedy (1999)

The public is invited to review these documents, as well as those concerning the Superfund process in general, before providing U.S. EPA with comments on the ROD Amendment proposal. The ACS Site Administrative Record, which contains all information used to make the ROD Amendment proposal, is also located at the Griffith Town Hall and the Griffith Branch Library repositories in Griffith, Indiana (addresses are provided below), as well as at the U.S. EPA office in Chicago, Illinois. The documents in these repositories are available for review at these locations during normal business hours.

Griffith Town Hall 111 N. Broad Street Griffith, Indiana 46319 (219) 924-7500



Griffith Branch Library 940 N. Broad Street Griffith, Indiana 46319 (219) 838-2825

PUBLIC COMMENT PERIOD AND MEETING SCHEDULE

The public comment period is scheduled to run from April 19, 1999 through May 21, 1999. U.S. EPA will host a public meeting at the Griffith Town Hall, Griffith, Indiana, on Thursday, May 13, 1999, at 7:00 pm, to present the ROD Amendment proposal and to take official public comments from the audience. If you have any juestions regarding this proposal or the Superfund process in general, please contact the following:

U.S. EPA Contacts

Kevin Adler Remedial Project Manager U.S. EPA (SR-6J) 77 W. Jackson Blvd. Chicago, IL 60604-3590 (312) 886-7078 adler.kevin@epa.gov Noemi Emeric Community Involvement Coordinator U.S. EPA (P-19J) 77 W. Jackson Blvd. Chicago, IL 60604-3590 (312) 886-0995 emeric.noemi@epa.gov **IDEM Contact**

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or call the U.S. EPA hotline -- (800) 621-8431





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